

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN OF PENNSYLVANIA**

**IN RE: NATIONAL FOOTBALL §
LEAGUE PLAYERS' CONCUSSION §
LITIGATION §
_____ §**

**THIS DOCUMENT RELATES TO: §
ALL ACTIONS §**

No. 12-md-2323 (AB)

MDL No. 2323

**Motion to Reconsider Withdrawing Fed. R. Evid. 706 Deposition
And
Motion for Extension of Time to Respond to the
Expert Report of Professor William B. Rubenstein**

Come now, The Alexander Objectors, Lubel Voyles, LLP, and Provost Umphrey Law Firm LLP (collectively, "Movants) and file this their motion, along with accompanying memorandum in support, asking the Court to reconsider the Court's Order (ECF 9527) withdrawing the Court's previously ordered deposition of expert appointed pursuant to Fed. R. Civ. P. 706 and to extend their time to file a response to the report and opinions of Professor William B. Rubenstein.

By this motion and the accompanying memorandum in support, Movants respectfully request that this Court (a) extend their time to respond to the Expert Report of Professor William B. Rubenstein by sixty days (up to and including March 7, 2018 and (b) establish a date and protocol for interested parties to take a limited deposition of Professor William B. Rubenstein *before* such responsive filings are due.

PRAYER

For the reasons set forth herein, and in their memorandum in support, Movants ask the Court to:

- (a) extend their time to respond to the Expert Report of Professor William B. Rubenstein by sixty days (up to and including March 7, 2018); and
- (b) establish a date and protocol for interested parties to take a limited deposition of Professor William B. Rubenstein *before* such responsive filings are due.

Date: December 19, 2017

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served on all counsel of record via the Court's ECF system on December 19, 2017.

/s/ Lance H. Lubel
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